

ARCHER & GREINER
A Professional Corporation
One Centennial Square
Haddonfield, NJ 08033-0968
(856) 795-2121
Attorneys for Defendant
AmGUARD Insurance Company

BY: KERRI E. CHEWNING, ESQUIRE

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

MARK DANIEL HOSPITALITY LLC
(D/B/A INC),

Civil Action No.: 20-6772 (FLW)

Plaintiff,

v.

AMGUARD INSURANCE COMPANY,

ELECTRONICALLY FILED

Defendant.

REQUEST FOR CLERK'S EXTENSION

Application is hereby made for a Clerk's Order extending by fourteen (14) days the time within which Defendant AmGUARD Insurance Company may answer, move or otherwise respond to the Complaint. It is represented that:

1. Defendant AmGUARD timely removed this case on June 2, 2020;
2. Pursuant to Fed. R. Civ. P. 81(c), the deadline for all Defendant to file an answer or other responsive pleading or motion is June 9, 2020;
3. That time period has not yet expired;
4. No previous extension has been obtained;

5. This application is made without any prejudice to the right of Defendant to assert any and all applicable defenses and arguments and nothing herein shall be deemed to constitute a waiver;

6. Pursuant to this application, the new due date for Defendant to answer, move or file some other responsive pleading will be June 23, 2020.

ARCHER & GREINER
A Professional Corporation
Attorneys for Defendant,
AmGUARD Insurance Company

By: Kerri E. Chewning
KERRI E. CHEWNING, ESQUIRE

Dated: June 5, 2020.

SO ORDERED

Clerk of Court

CERTIFICATE OF SERVICE

I hereby certify that on June 5, 2020, I filed, and served on all counsel of record, the foregoing Request for Clerk's Extension, via CM/ECF.

/s/ Kerri E. Chewning

KERRI E. CHEWNING